

JP:LMN

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M - 06 - 297

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)
and 960)

SHAUNTAY MICHELLE SPENCER,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

JOSE RODRIGUEZ, being duly sworn, deposes and states that he is a Special Agent of the United States Immigration and Customs Enforcement, duly appointed according to law and acting as such.

Upon information and belief, on or about March 13, 2006, within the Eastern District of New York and elsewhere, defendant SHAUNTAY MICHELLE SPENCER did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:¹

^{1/} Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am

1. On or about March 13, 2006, defendant SHAUNTAY MICHELLE SPENCER arrived at John F. Kennedy International Airport ("J.F.K. Airport") in Queens, New York, aboard American Airlines Flight No. 796 from Aruba.

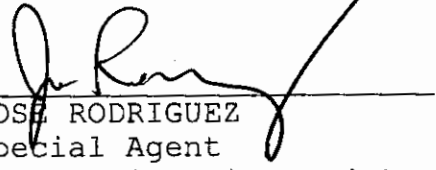
2. Defendant SHAUNTAY MICHELLE SPENCER was selected for a routine Customs and Border Protection ("CBP") examination. Defendant SHAUNTAY MICHELLE SPENCER was in possession of one red shoulder bag. The defendant was asked if she had packed the bag herself, to which she replied "yes." A baggage exam yielded negative results. During the baggage exam, the defendant was trembling and sweating profusely. The defendant also stated that she was unemployed and was wearing bulky, loose fitting clothing.

3. A pat-down search was performed. During the pat-down search, a hard, thick object was felt at the back of the defendant's thighs and buttocks. The defendant then removed two packages containing a powdery substance from her thighs and buttocks area from inside a girdle. The powdery substance inside the first package field tested positive for heroin. The powdery substance inside the second package field tested positive for cocaine. Moreover, during a search of the defendant's jacket, a powdery substance contained inside a small piece of plastic was found. That substance field tested positive for heroin. Defendant SHAUNTAY MICHELLE SPENCER was then placed under arrest.

aware.


4. The total approximate gross weight of the heroin found inside the first package and the small piece of plastic was 1,041.4 grams. The total approximate gross weight of the cocaine found inside the second package was 1,024.3 grams.

WHEREFORE, your deponent respectfully requests that defendant SHAUNTAY MICHELLE SPENCER be dealt with according to law.


JOSE RODRIGUEZ
Special Agent
U.S. Immigration and Customs
Enforcement

Sworn to before me this
14th day of March, 2006


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NOTARY JUDGE
NEW YORK